

STARR, GERN, DAVISON & RUBIN

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

105 EISENHOWER PARKWAY

SUITE 401

ROSELAND, NEW JERSEY 07068-1640

TEL 973 403-9200

FAX 973 226-0031

WWW.STARRGERN.COM

EDWIN S. RUBIN (1929-2017)

RONALD L. DAVISON

AMOS GERN*†

IRA M. STARR*

JONATHAN J. LERNER*^

NICHOLAS STEVENS*^

STEPHEN R. URBINATO□

JOHN T. BROST*

ALONA MAGIDOVÁ*^

HENRY J. CISTRELLI

L. JUSTINE JURICK*^

DAVID WENDEL

STEWART J. MILLER

ANA RITA FERREIRA*

COUNSEL TO THE FIRM

LARRY M. COLE

—
NEW YORK OFFICE
ONE PENN PLAZA
31ST FLOOR - SUITE 3100
NEW YORK, NEW YORK 10119
TEL 212 223-1610

Email: jlerner@starrgern.com

PLEASE REPLY TO ROSELAND OFFICE

June 5, 2019

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Serrano Torres, et al. v. Ten Westside Corp., et al.,
Case No. 18-cv-330 (PAE)

Toj Ovalle, et al. v. Ten Westside Corp., et al.
Case No. 18-cv-7252 (PAE)

Osorio Escobar, et. al. v. 27 Madison Avenue Corp., et. al.
Case No. 19-cv-2608 (PAE)

Dear Judge Engelmayer:

We are attorneys for defendants Ten Westside Corp., 27 Madison Avenue Corp., Kyeong Hwang and Josephine Kim in the above-referenced matters, which are in the process of pretrial discovery. As per Your Honor's previous direction, the parties are in the process of synchronizing discovery in the three related actions. We write with consent of all counsel to request a 30 day extension of the fact discovery period. We respectfully submit that, given the newly filed Escobar action, in order to consolidate discovery in all three actions the parties need a modest extension of the discovery period.

By way of further explanation, the above-referenced defendants were not served in the Escobar action. That notwithstanding, earlier today we filed an answer on behalf of defendants 27 Madison Avenue Corp., Kyeong Hwang and Josephine Kim in order to expedite the process,

OF COUNSEL

BRUCE M. PITMAN*^

CHARLES F. VUOTTO, JR.^○

DONALD S. GOLDMAN^

LISA BESSON GERAGHTY*

LYNN B. NORCIA^

BENJAMIN J. MENASHA

CATHYANNE A. PISCIOTTA*

—
* MEMBER NJ & NY BAR

○ MEMBER NJ & DC BAR

□ MEMBER NJ & PA BAR

◀ MEMBER NJ & TX BAR

▼ MEMBER OF THE NATIONAL ACADEMY OF DISTINGUISHED NEUTRALS

† CERTIFIED BY THE SUPREME COURT OF NEW JERSEY AS A CIVIL TRIAL ATTORNEY

◊ CERTIFIED BY THE SUPREME COURT OF NEW JERSEY AS A MATRIMONIAL LAW ATTORNEY

^ N.J.C.R. 1:40
QUALIFIED MEDIATOR

• L.L.M. IN TAXATION

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and assist in the consolidation of discovery. In order to conduct meaningful depositions it will be necessary for the parties to first exchange written discovery responses on the Escobar matter and complete the exchange of outstanding discovery responses in the Torres and Ovalle matters.

We respectfully submit that the consolidation of the Escobar case, which is in the initial pleading stage, constitutes exceptional circumstances warranting an extension of the fact discovery period so that we can complete the foregoing in an efficient and practical manner.

We thank Your Honor for the Court's consideration of this request.

Respectfully,

ts/ Jonathan J. Lerner

Jonathan J. Lerner

JJL/lc
c: Counsel of Record via ECF